

Hearing Date: September 1, 2022 at 11:00 a.m. (Eastern Time)

Objection Date: July 29, 2022 at 4:00 p.m. (Eastern Time)

Richard J. Cooper
Lisa M. Schweitzer
Luke A. Barefoot
Thomas S. Kessler
CLEARY GOTTLIEB STEEN & HAMILTON LLP
One Liberty Plaza
New York, New York 10006
Telephone: (212) 225-2000
Facsimile: (212) 225-3999

*Counsel to the Debtors
and Debtors-in-Possession*

In re:

LATAM Airlines Group S.A., *et al.*,

Debtors.¹

Chapter 11

Case No.: 20-11254 (JLG)

Jointly Administered

**NOTICE OF HEARING
ON INTERIM APPLICATIONS FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED
FROM FEBRUARY 1, 2022 THROUGH AND INCLUDING MAY 31, 2022²**

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number (as applicable), are: LATAM Airlines Group S.A. (59-2605885); Lan Cargo S.A. (98-0058786); Transporte Aéreo S.A. (96-9512807); Inversiones Lan S.A. (96-5758100); Technical Training LATAM S.A. (96-847880K); LATAM Travel Chile II S.A. (76-2628945); Lan Pax Group S.A. (96-9696800); Fast Air Almacenes de Carga S.A. (96-6315202); Línea Aérea Carguera de Colombia S.A. (26-4065780); Aerovías de Integración Regional S.A. (98-0640393); LATAM Finance Ltd. (N/A); LATAM-Airlines Ecuador S.A. (98-0383677); Professional Airline Cargo Services, LLC (35-2639894); Cargo Handling Airport Services LLC (30-1133972); Maintenance Service Experts LLC (30-1130248); Lan Cargo Repair Station LLC (83-0460010); Prime Airport Services, Inc. (59-1934486); Professional Airline Maintenance Services LLC (37-1910216); Connecta Corporation (20-5157324); Peuco Finance Ltd. (N/A); Latam Airlines Perú S.A. (52-2195500); Inversiones Aéreas S.A. (N/A); Holdco Colombia II SpA (76-9310053); Holdco Colombia I SpA (76-9336885); Holdco Ecuador S.A. (76-3884082); Lan Cargo Inversiones S.A. (96-9696908); Lan Cargo Overseas Ltd. (85-7752959); Mas Investment Ltd. (85-7753009); Professional Airlines Services Inc. (65-0623014); Piquero Leasing Limited (N/A); TAM S.A. (N/A); TAM Linhas Aéreas S.A. (65-0773334); Aerolinhas Brasileiras S.A. (98-0177579); Prismah Fidelidade Ltda. (N/A); Fidelidade Viagens e Turismo S.A. (27-2563952); TP Franchising Ltda. (N/A); Holdco I S.A. (76-1530348) and Multiplus Corretora de Seguros Ltda. (N/A). For the purpose of these Chapter 11 Cases, the service address for the Debtors is: 6500 NW 22nd Street Miami, FL 33121.

² As noted below, the Applications for Claro & Cia, PwC Brazil, Ernst and Young Auditores Independentes S.S., Auditor and PwC Colombia include requests for allowances of compensation that occurred during previous fee periods.

PLEASE TAKE NOTICE that the above-captioned Debtors and Debtors in Possession, as well as certain other estate retained professionals, have filed Interim Applications for Allowance of Compensation and for Reimbursement of Actual and Necessary Expenses Incurred from February 1, 2022 Through and Including May 31, 2022 (together, the “Applications”).

PLEASE TAKE FURTHER NOTICE that any responses or objections (the “Objections”) to the Applications shall: (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the Local Bankruptcy Rules for the Southern District of New York, all General Orders applicable to Chapter 11 Cases in the United States Bankruptcy Court for the Southern District of New York, and the *Order Implementing Certain Notice and Case Management Procedures* (ECF No. 112) (the “Case Management Order”); (c) be filed electronically with this Court on the docket of In re LATAM Airlines Group S.A., Case No. 20-11254 (JLG) by registered users of this Court’s electronic filing system and in accordance with the Bankruptcy Court’s General Order M-399 (which is available at <http://www.nysb.uscourts.gov>); and (d) be served so as to be actually received by **July 29, 2022** at 4:00 p.m., prevailing Eastern Time (the “Objection Deadline”), by: (i) the Chambers of the Honorable Judge James L. Garrity Jr., United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004; (ii) the Debtors, LATAM, Attn: Jose Miguel Valenzuela Roubillard and to Chapter 11 counsel to the Debtors, Cleary Gottlieb Steen Hamilton LLP, One Liberty Plaza, New York, New York 10006, Attn: Richard J. Cooper, Lisa M. Schweitzer and Luke A. Barefoot; (iii) the Office of the United States Trustee for Region 2, Attn: Brian Masumoto; (iv) Dechert LLP, 1095 6th Ave, New York, NY 10036, Attn: Craig

Druehl, Esq., Allan Brilliant, Esq., and David Herman, Esq., counsel for the official committee of unsecured creditors (the “UCC”); and (v) any parties that have appeared and requested notice pursuant to the Bankruptcy Rules.

PLEASE TAKE FURTHER NOTICE that, if no objections are timely filed and served in accordance with the foregoing procedures by the Objection Deadline, the Court may approve the Applications without further notice.

PLEASE TAKE FURTHER NOTICE that a hearing (the “Hearing”) will be held at 11:00 a.m. (Eastern Time) on September 1, 2022 before the Honorable Judge James L. Garrity, Jr., United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 to consider the Applications. In light of the COVID-19 pandemic, the Hearing will only be conducted telephonically. The following Applications shall be considered:

	Name of Applicant	ECF No.	Period for Which Compensation and Expense Reimbursement is Sought:	Amount of Interim Compensation Requested	Amount of Interim Expenses Requested
1.	Deloitte Advisory SpA	6013	2/1/2022 - 5/31/22	\$1,308,994.00	\$0.00
2.	Deloitte Impuestos Y Servicios Legales, S.C., ("Deloitte Mexico")	6015	2/1/22 - 5/31/22	\$16,304.00	\$0.00
3.	FTI Consulting, Inc.	6016	2/1/22 – 5/31/22	\$5,599,151.50	\$1,649.60
4.	Togut, Segal & Segal LLP	6017	2/1/22 – 5/31/22	\$1,785,015.00	\$20,519.68
5.	Claro & Cia	6019	6/1/21 – 5/31/22	\$1,074,713.50	\$61,854.07
6.	Enrst and Young Auditores Independentes S.S., Auditor	6020	7/9/20 – 5/31/22	\$1,411,651.62	\$45,975.23
7.	Norton Rose Fulbright US LLP	6021	2/1/22 – 5/31/22	\$757,109.60	\$40,233.07

8.	Norton Rose Fulbright LLP (London)	6023	2/1/22 – 5/31/22	\$626,305.40	\$622.79
9.	Cleary, Gottlieb, Steen & Hamilton LLP	6024	2/1/22 – 5/31/22	\$19,884,165.00	\$683,448.87
10.	Kroll Restructuring Administration LLC	6025	2/1/22 – 5/31/22	\$195,686.53	\$0.00
11.	RPC Abogados Cia. Ltda.	6026	2/1/22 – 5/31/22	\$73,472.00	\$0.00
12.	Brigard & Urritia Abogados S.A.S.	6027	2/1/22 - 5/31/22	\$76,612.51	\$28,561.01
13.	Deloitte Tax LLP	6028	2/1/22 – 5/31/22	\$7,687.00	\$0.00
14.	Dechert LLP	6029	2/1/22 – 5/31/22	\$8,940,342.50	\$227,345.45
15.	Riveron, RTS LLC	6030	2/1/22 – 5/31/22	\$1,033,587.50	\$950.00
16.	Demarest Advogados	6031	2/1/22 – 5/31/22	\$100,999.47	\$3,095.07
17.	Ferro, Castro Neves, Daltro & Gomide	6032	2/1/22 – 5/31/22	\$24,320.00	\$0.00
18.	Lee, Brock, Camargo Advogados	6034	2/1/22 – 5/31/22	\$3,539,208.80	\$2,914.50
19.	UBS Securities LLC	6035	2/1/22 – 5/31/22	\$700,000.00	\$2,575.86
20.	PricewaterhouseCoopers Consultores Auditores SpA (PwC Chile)	6036	2/1/22 – 5/31/22	\$495,585.27	\$135,086.14
21.	Morales & Besa LTDA	6040	2/1/22 – 5/31/22	\$90,231.00	\$0.00
22.	Deloitte Peru	6041	2/1/22 – 5/31/22	\$77,880.00	\$0.00
23.	Klestadt Winters Jureller Southard & Stevens, LLP	6059	2/1/22 – 5/31/22	\$105,649.00	\$420.00
24.	Pricewaterhousecoopers Auditores Independentes LTDA (PwC Brazil)	6088	7/1/2021-5/31/22	\$452,334.12	\$3,943.30
25.	PwC Contadores Y Auditores SAS (PwC Colombia)	6098	5/20/2021 - 2/28/22	\$92,434.05	\$17,562.47

PLEASE TAKE FURTHER NOTICE that parties wishing to participate in the Hearing must make arrangements through CourtSolutions LLC (www.courtsolutions.com).

Instructions to register for CourtSolutions LLC are attached to General Order M-543 (which can be found at <http://www.nysb.uscourts.gov>). All parties filing Applications and any objecting parties are required to attend the Hearing in accordance with the Bankruptcy Court's General Order M-543 and failure to attend may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE that on July 27, 2022, the Debtors filed the *Omnibus Notice of Request for Release of Certain Withheld Professional Fees at the September 1, 2022 Interim Fee Hearing* (ECF No. 6143), which provides notice that at the Hearing the Debtors will also seek Court approval of a new agreement regarding holdbacks, as well as the release of 50% of prior holdbacks.

PLEASE TAKE FURTHER NOTICE that copies of the Applications and other pleadings for subsequent hearings may be obtained free of charge by visiting the Prime Clerk website at <https://cases.primeclerk.com/LATAM>. You may also obtain copies of any pleadings by visiting at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: July 28, 2022
New York, New York

/s/ Luke A. Barefoot
Richard J. Cooper
Lisa M. Schweitzer
Luke A. Barefoot
Thomas S. Kessler
CLEARY GOTTlieb STEEN & HAMILTON LLP
One Liberty Plaza
New York, New York 10006
Telephone: (212) 225-2000
Facsimile: (212) 225-3999

*Counsel to the Debtors
and Debtors-in-Possession*